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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAURA PETERS,

16 Plaintiff,
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18 v.
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20 SWIFT TRANSPORTATION CO. OF
21 ARIZONA, LLC; DOE DRIVER; DOES I
22 through XX, inclusive; and ROE BUSINESS
23 ENTITIES I through XX, inclusive,
24
25 Defendants.

Case No. 2:19-cv-00874-GMN-EJY

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**STIPULATION AND ORDER TO
EXTEND JOINT PRETRIAL
DISCLOSURE DEADLINE
(THIRD REQUEST)**

29 Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for
30 Defendant Swift Transportation Co. of Arizona, LLC (“Swift”) and Plaintiff Laura Peters hereby
31 STIPULATE to extend the time for the parties to file their Joint Pretrial Disclosure by 9 days.
32 This is the third stipulation seeking to extend the subject deadline. The current deadline for said
33 disclosure is March 28, 2023. The Court previously granted the parties’ stipulation to extend the
34 deadline from February 14, 2023 to March 7, 2023 (ECF No. 100) and March 7, 2023 to March
35 28, 2023 (ECF No. 103). This extension would give the parties until April 6, 2023.



1 The parties submit that good cause exists for the requested extension. Since the last
 2 extension, counsel have been working on witness lists and consolidating exhibits into a joint
 3 exhibit list. The parties have agreed to exchange witness lists on March 29, 2023. Further, the
 4 parties are circulating a joint exhibit list on March 29, 2023, which consolidates the parties'
 5 separate exhibits into a more manageable and succinct format. The parties request the additional
 6 nine days to determine if any deposition designations are necessary in light of the witness lists—
 7 and to the extent they are, make such designations and objections. Based on discussions amongst
 8 counsel, it does not appear that any designations will be necessary at this time. Further, the
 9 parties will use the additional time to review the joint exhibit list to confirm that it captures
 10 complete information for both sides. This process is complicated by the fact that the exhibit list
 11 includes records from over 60 medical providers for whom each side produced separate sets of
 12 documents in a continual fashion. After conferring via telephone again this morning, counsel
 13 believe that they can have a complete pre-trial order prepared by April 6, 2023.

14 The parties further submit that this extension is requested in good faith and with no
 15 dilatory motive. Respectfully submitted,

16 DATED: March 28, 2023

DATED: March 28, 2023

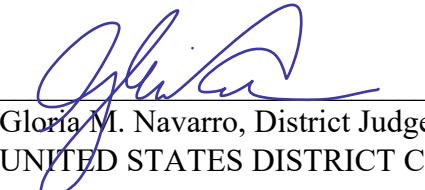
17 /s/ Ryan T. Gormley
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17 /s/ Ramzy Paul Ladah (with permission)
 18 Ramzy Paul Ladah, Esq.
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 22 *Attorneys for Plaintiff*
 23 *Laura Peters*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 Dated this 28 day of March, 2023.

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 28 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT